Supreme Court, U. S.
FILED
MAR 18 1976
MICHAEL RODAK, JR., CLERK

IN THE

# Supreme Court of the United States

OCTOBER TERM, 1975

**No. 75-616**

METROPOLITAN HOUSING DEVELOPMENT CORPORATION, ET AL.,
*Respondents,*

*vs.*

THE VILLAGE OF ARLINGTON HEIGHTS, ET AL.,
*Petitioners,*

NORTHWEST OPPORTUNITY CENTER AND ELUTERIA D. MALDONADO,
*Intervening Respondents.*

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT.

## OBJECTIONS TO MOTION OF THE AMERICAN SOCIETY OF PLANNING OFFICIALS FOR LEAVE TO FILE A BRIEF AS AMICUS CURIAE.

JACK M. SIEGEL,
39 South LaSalle Street,
Chicago, Illinois 60603,
312-263-2968,
*Attorney for Petitioners.*

Gunthorp-Warren Printing Company, Chicago • Financial 6-6565

2

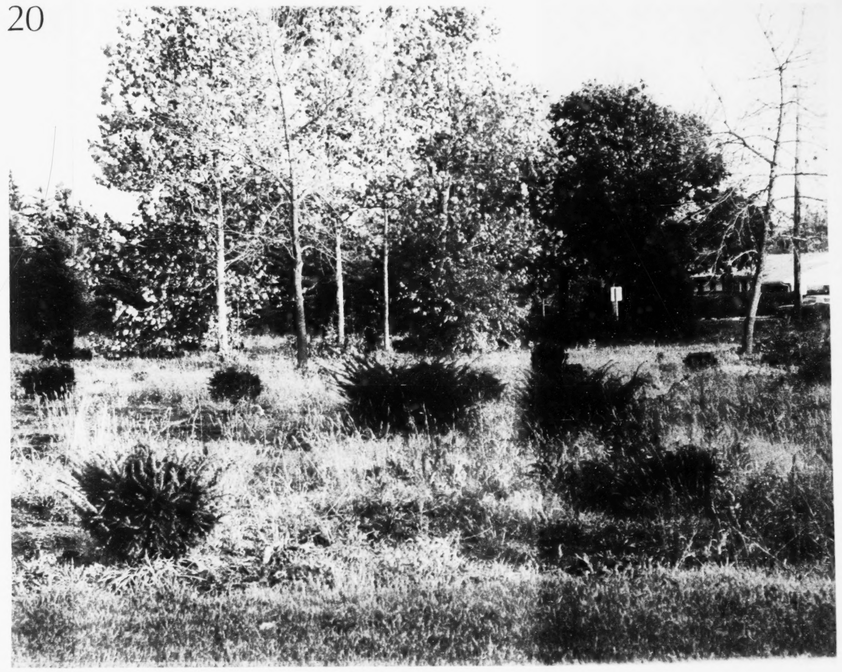
18

NORTH

19

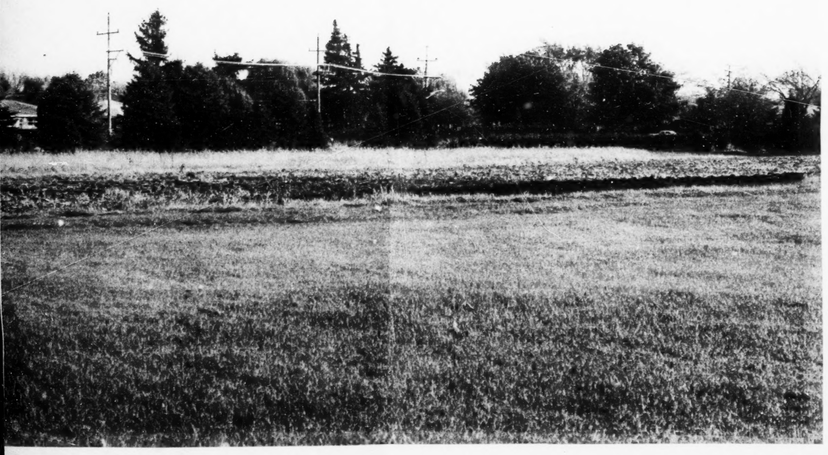
NORTH

20



SOUTHEAST

24



SOUTHEAST

25

SOUTH

26

EAST

APPENDIX F

F1

DEFENDANT'S EXHIBIT NO. 2

IN THE

# Supreme Court of the United States

OCTOBER TERM, 1975.

---

**No. 75-616.**

---

METROPOLITAN HOUSING DEVELOPMENT CORPORATION, ET AL.,

*Respondents,*

*vs.*

THE VILLAGE OF ARLINGTON HEIGHTS, ET AL.,

*Petitioners,*

NORTHWEST OPPORTUNITY CENTER AND ELUTERIA D. MALDONADO,

*Intervening Respondents.*

---

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT.

---

## OBJECTIONS TO MOTION OF THE AMERICAN SOCIETY OF PLANNING OFFICIALS FOR LEAVE TO FILE A BRIEF AS AMICUS CURIAE.

---

Now comes the Village of Arlington Heights, et al., petitioners herein, by Jack M. Siegel, their attorney, and, pusuant to Rule 42(3) of the United States Supreme Court, object to the motion of the American Society of Planning Officials for leave to file a brief as amicus curiae. In support of said objections, petitioners say as follows:

1. That the motion for leave to file a brief as amicus curiae fails to concisely state the nature of the applicant's interest in the issues in this case, but instead merely describes the status of the American Society of Planning Officials and contains general allegations not related to the specific nature of the case before this Court. That the applicant seeks to "proffer a balanced prospective of the issues presented by this case," but by the terms of its motion is wholly biased and in no way objective about the issues.

2. That said motion fails to set forth facts or questions of law that have not been adequately presented by the parties, or reasons for believing that any facts or questions of law will not be adequately presented by the parties. That, in fact, the respondents herein have filed a brief in excess of 50 pages which, together with the brief of the petitioners, fully sets forth all the facts and questions of law relative to this cause.

3. That the motion fails to set forth any facts showing that the membership of the American Society of Planning Officials has in fact consented or supported the filing of said motion and brief.

4. That the applicant has failed to participate in the trial below in the District Court for the Northern District of Illinois or in the cause on hearing in the Court of Appeals for the Seventh Circuit, and has evidenced no interest in this cause until its attempt to file a brief as amicus curiae.

5. That the petitioners herein have withheld consent to the filing of a brief by the applicant for the reason that no necessity exists for the filing of said brief since all the questions of fact and law are and will be adequately presented to this Court by the original parties herein, and the additional burden of answering said brief would be a hardship on the petitioners, without any benefit to this Court. That the petitioners believe that the applicant has not thoroughly considered all the issues before it determined to file its brief, and never consulted the

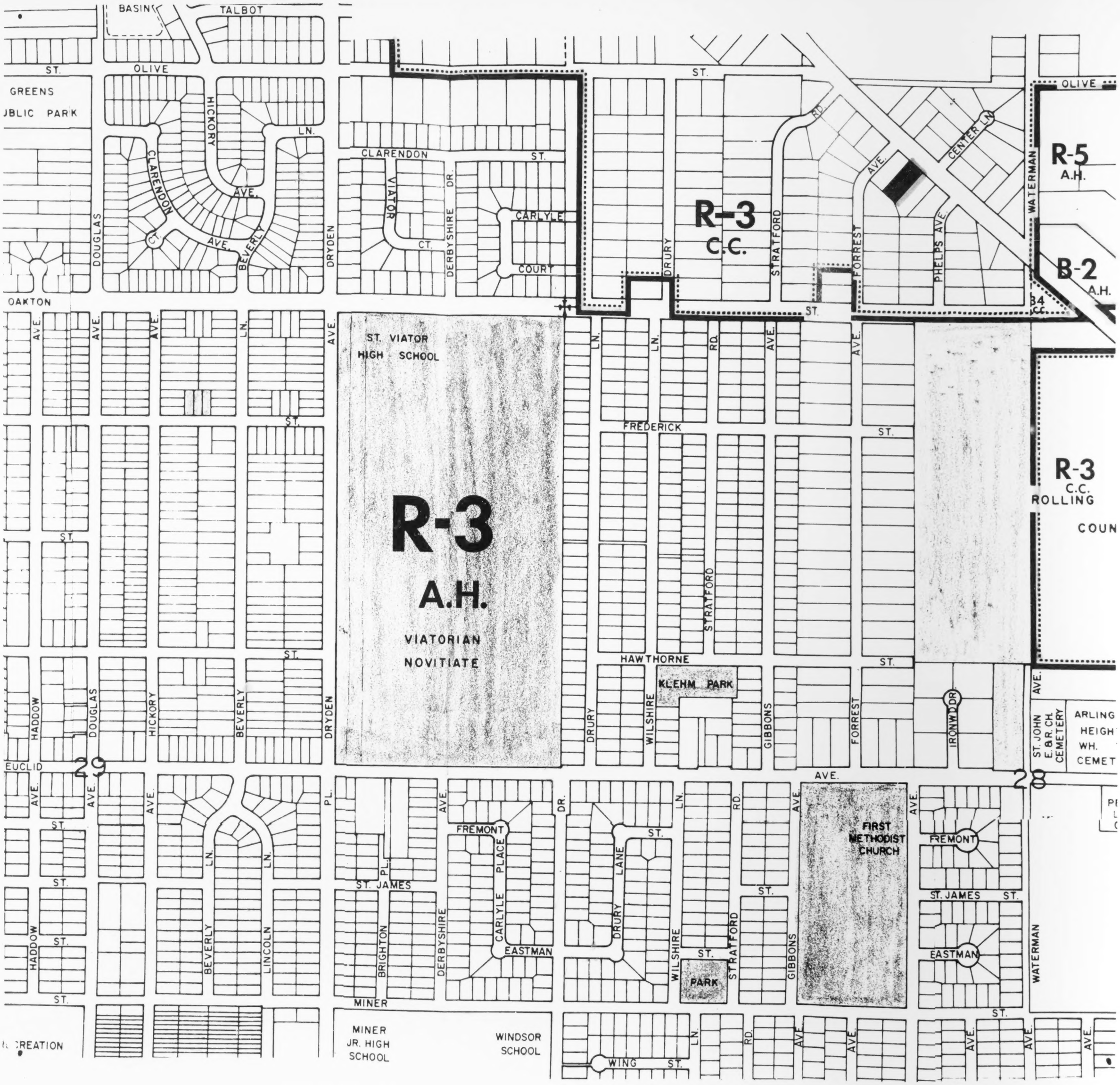


petitioners in an effort to learn the point of view of the petitioners herein.

WHEREFORE, the petitioners respectfully object to the filing of said brief as amicus curiae and respectfully request that said motion be denied.

Respectfully submitted,

JACK M. SIEGEL,
39 South LaSalle Street,
Chicago, Illinois 60603,
312-263-2968,
*Attorney for Petitioners.*




SINGLE FAMILY

MULTI-FAMILY

BUSINESS

INSTITUTIONAL

SCHOOLS & PARKS

EXISTING LAND USE

EXISTING ZONING

APPENDIX E

E1

DEFENDANT'S EXHIBIT NO. 1

3

21

NORTHEAST

22

SOUTH

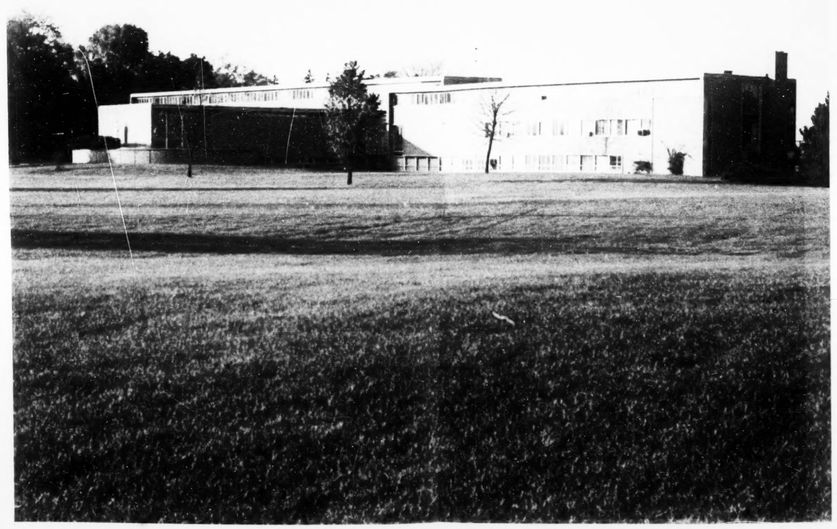
23

EAST

27

EAST

28



NORTHWEST

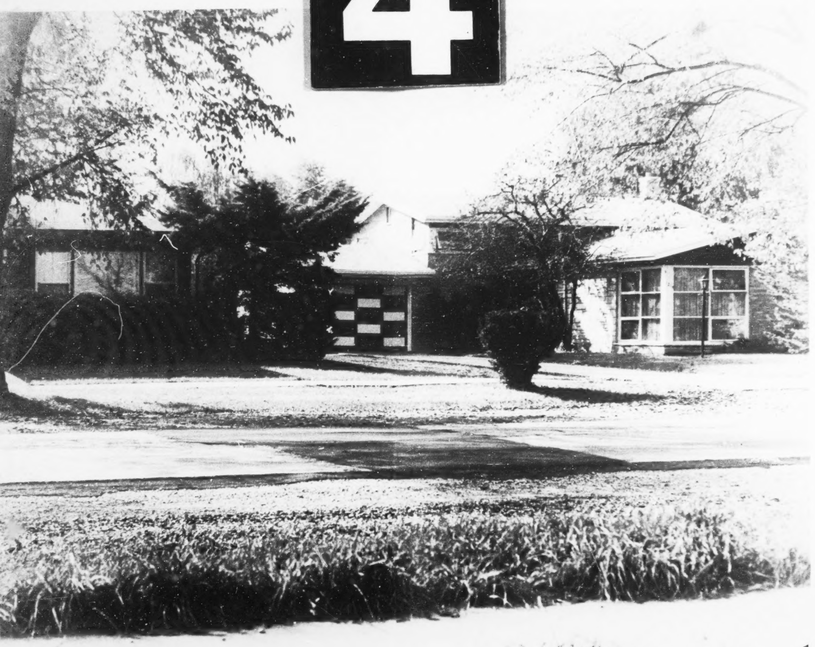
29

EAST

F2

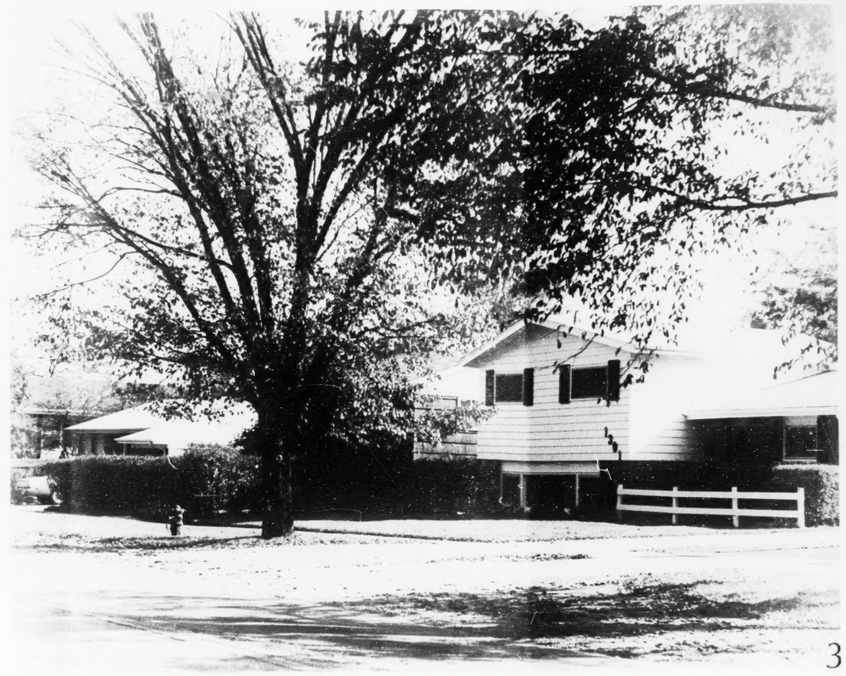
DEFENDANT'S EXHIBIT NO. 2

4

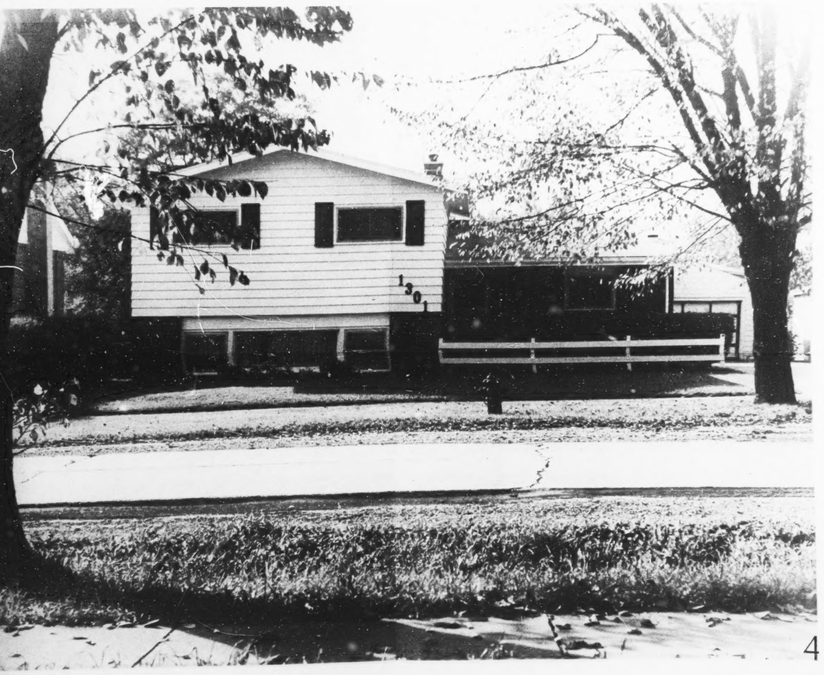


1

2



3




4

14

17

SOUTH SIDE OF EUCLID AVENUE

F3

DEFENDANT'S EXHIBIT NO. 14

5

5

6

7

8

9

10

F4

WEST SIDE OF DRURY LANE

DEFENDANT'S EXHIBIT NO. 14

6

11

12

13

WEST SIDE OF DRURY LANE

15

16

WEST SIDE OF DRYDEN AVENUE

F5

DEFENDANT'S EXHIBIT NO. 14